



B2C2, U.S.A.
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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 10/16/2023

MEMORANDUM ENDORSED

October 12, 2023

VIA ECF and EMAIL

Hon. Gregory Woods
United States District Judge
Southern District of New York

Re: Ai Coin Inc. et al. v. B2C2 USA Inc., et al., No 23-cv-5082 (GHW) (SDNY)

Dear Judge Woods,

Defendants B2C2 USA Inc. and B2C2 Securities, LLC and Plaintiffs Ai Coin Inc., et al. (collectively, the “Parties”) make this joint letter submission to the Court for the above-referenced matter as: (1) an initial joint status letter to comply with the Court’s Order and Notice of Initial Pretrial Conference (“IPTC”) dated June 20, 2023 (ECF No. 4); and (2) a joint letter application for an adjournment of the IPTC, currently scheduled for October 19, 2023. This is the second request for an adjournment of the IPTC.

In light of the Court’s recent Order extending Defendants’ due date for responding to the complaint in the captioned matter (“Complaint”) until October 24, 2023 (ECF No. 20), the Parties have just today commenced their efforts to meet and confer and address the various matters outlined in the Court’s IPTC Order, including the prospects for resolving this action at an early stage. The Parties expect to resume their meet and confer efforts next week, which will prepare for the filing of a case management plan and a productive IPTC.

Consequently, in light of the current posture of this case, and pursuant to the Court’s Individual Rule I(E), the Parties jointly request an adjournment of the IPTC scheduled for October 19, 2023 for a period of at least two weeks after the October 24, 2023 deadline for the Defendants to file an answer to the Complaint (until no earlier than November 7, 2023, or for a later alternative date that is available to the Court).

We thank the Court for its attention to this matter.

Yours Sincerely,

Dean C. Sovolos
General Counsel
B2C2 U.S.A., Inc.
Counsel for Defendants

Grant Dkt. No. 21: The parties’ application to adjourn the initial pretrial conference is granted. The initial pretrial conference is adjourned to November 9, 2023 at 3:00 p.m. The Clerk is directed to terminate the motion at Dkt. No. 21.

SO ORDERED.

Dated: October 16, 2023
New York, New York

GREGORY H. WOODS
United States District Judge

Cc: Counsel for Plaintiff (via ECF and email)